

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Laura Patrick,

Plaintiff,

v.

Jansson Corporation,

Defendant.

Civil Action No.

04 CV 10427 RGS

 RECEIPT # _____
 AMOUNT \$ 150-
 SUMMONS ISSUED _____
 LOCAL RULE 4.1 _____
 WAIVER FORM _____
 MCF ISSUED _____
 BY DPTY. CLK. 28
 DATE 3-3-04
MAGISTRATE JUDGE Cohen**NOTICE OF REMOVAL**

Defendant Jansson Corporation ("Jansson"), pursuant to 28 U.S.C. § 1332 and 28 U.S.C. § 1441, hereby removes the above-captioned action to the United States District Court for the District of Massachusetts. In support thereof, Defendant states as follows:

1. On February 12, 2004, Defendant was served by mail with a copy of a Summons and Complaint ("Complaint"), a copy of which is attached hereto as Exhibit A. The Complaint was captioned in the Superior Court of Essex County, Commonwealth of Massachusetts, and was titled Laura E. Patrick v. Jansson Corporation, C.A. No. 2004-00122-B. Said Complaint was filed in the Superior Court of Essex County, Commonwealth of Massachusetts, and the Summons and Complaint constitute all process, pleadings, and orders filed or served upon Defendant to date in this action.

2. Plaintiff alleges in her Complaint that she is a resident of the Commonwealth of Massachusetts.

3. Defendant Jansson is a division of Taylor Corporation, a corporation formed under the laws of the State of Minnesota which has its principal place of business at 1725 Roe Crest Drive, P.O. Box 3728, North Mankato, MN 56002-3728.

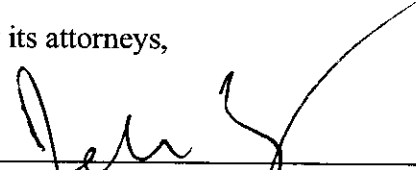
4. The United States District Court for the District of Massachusetts has original jurisdiction over this action pursuant to 28 U.S.C. § 1332, because the dispute is between citizens of different states and, based upon the causes of action asserted and the relief sought in the Complaint, the amount in controversy is in excess of \$75,000, exclusive of interest and costs.

5. This Notice of Removal is being filed within 30 days after receipt by Defendant of a copy of the Summons and Complaint and is timely filed under 28 U.S.C. § 1446(b).

WHEREFORE, Defendant prays that the above action now pending in the Superior Court, Essex County, Commonwealth of Massachusetts, be removed to the United States District Court for the District of Massachusetts.

JANSSON CORPORATION

By its attorneys,



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Dated: March 3, 2004